

FILED
At Albuquerque NM

MAY 07 2015

MATTHEW J. DYKMAN
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LEON J. TAFOYA,

Defendant.

CRIMINAL NO. 15-1631 mca

Count 1: 18 U.S.C. §§ 924(c)(1)(A), and
924(c)(1)(A)(i-iii): Possessing a Firearm
in Furtherance of a Crime of Violence;

Count 2: 18 U.S.C. §§ 1152 and 13:
N.M.S.A. 1978, § 30-3-2: Aggravated
Assault with a Deadly Weapon;

Count 3: 18 U.S.C. §§ 1153 and
113(a)(6): Assault Resulting in Serious
Bodily Injury.

INFORMATION

The United States Attorney charges:

Count 1

On or about September 7, 2014, in Rio Arriba County, in the District of New Mexico, the defendant, **LEON J. TAFOYA**, knowingly possessed a firearm, Kimber Tactical Entry II .45 ACP Pistol, serial #K333644, in furtherance of a crime of violence for which **LEON J. TAFOYA** may be prosecuted in a court of the United States, namely Aggravated Assault with a Deadly Weapon as charged in Count 2 of this information.

In violation of 18 U.S.C. §§ 924(c)(1)(A), and 924(c)(1)(A)(i-iii).

Count 2

On or about September 7, 2014, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **LEON J. TAFOYA**, an Indian, did commit an assault of John

Doe 1, a non-Indian, by intentionally, knowingly, or recklessly exhibiting a firearm, in the immediate presence of John Doe 1 by displaying the firearm in a rude, angry, or threatening manner.

In violation of 18 U.S.C. §§ 1152 and 13, and N.M.S.A. 1978, § 30-3-2.

Count 3

On or about September 7, 2014, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **LEON J. TAFOYA**, an Indian, did knowingly and unlawfully assault John Doe 2, such assault resulting in serious bodily injury.

In violation of 18 U.S.C. §§ 1153 and 113(a)(6).

DAMON P. MARTINEZ
United States Attorney

A handwritten signature in cursive script, appearing to read "Novaline D. Wilson", is written over a horizontal line.

NOVALINE D. WILSON
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